

1 ANTHONY L. HALL, ESQ.
2 Nevada Bar No. 5977
3 AHall@SHJNevada.com
4 JONATHAN A. MCGUIRE, ESQ.
5 Nevada Bar No. 15280
6 JMcGuire@SHJNevada.com
7 SIMONS HALL JOHNSTON PC
8 6490 S. McCarran Blvd., Ste. F-46
9 Reno, Nevada 89509
10 Telephone: (775) 785-0088

11
12 *Attorneys for Defendants Helicopter
13 Parts International, Inc., Harry
14 Niwranski, and Anthony Magnotta*

SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Phone: (775) 785-0088

15
16
17
18
19
20
21
22
23
24
25
26
27
28
**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ERIC BARROW, an individual

Plaintiff,

v.

HELICOPTER PARTS INTERNATIONAL,
INC., a Nevada Corporation; HARRY
NIWRANSKI, an individual; ANTHONY
MAGNOTTA; DOES I through X, Inclusive;
and ROE CORPORATIONS I through X,
inclusive,

Defendants.

CASE NO.: 3:20-cv-00528-MMD-CLB

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT TO RESPOND TO
COMPLAINT**

(First Request)

Plaintiff Erica Barrow (“Barrow”) and Defendants Helicopter Parts International, Inc. (“HPI”), Harry Niwranski (“Niwranski”), and Anthony Magnotta (“Magnotta”) (collectively, when possible, “Defendants”), by and through their respective counsel, hereby submit the following Stipulation and [Proposed] Order to Extend Deadline for Defendant to Respond to Complaint. Defendants seek a one-week extension to answer or otherwise respond to the Plaintiff’s Complaint. This request is made in good faith to accommodate the schedule of defense counsel, and is not made for the purpose of delay, and will not result in any undue delay or prejudice. Accordingly, the

1 Parties have agreed and stipulate that the deadline for the Defendants to answer or otherwise respond
2 to Plaintiff's Complaint will be on or before October 30, 2020.

3

4 DATED this 22nd day of October, 2020.

5 BY: /s/ Sean A. Neahusan

6 Sean A. Neahusan, Esq.
7 Sean Neahusan, Attorney at Law, LLC
8 300 S. Arlington Ave, Ste B
9 Reno, NV 89501
sean@neahusanlaw.com
Phone: (775) 432-1581
Fax: (775) 329-4553

10 *Attorneys for Plaintiff*

DATED this 22nd day of October, 2020.

BY: /s/ Jonathan A. McGuire

ANTHONY L. HALL, ESQ.
Nevada Bar No. 5977
JONATHAN A. MCGUIRE, Esq.
Nevada Bar No. 15280
SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, Nevada 89509
Telephone: (775) 785-0088

11 *Attorneys for Defendants*

12 **IT IS SO ORDERED:**

13 Dated: October 22, 2020.

14 
15 UNITED STATES MAGISTRATE JUDGE

16
17
18
19
20
21
22
23
24
25
26
27
28

SIMONS HALL JOHNSTON PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Phone: (775) 785-0088